REMARKS

Claims 1-41 were pending in the application at the time the present Office Action was mailed. Claims 5 and 18 have been rewritten in independent form to include all the features of the corresponding base claims and any intervening claims. Accordingly, claims 5 and 18 have not been substantively amended or narrowed, and any subsequent rejection of these claims on new grounds cannot be made final. Claim 38 has been amended to enhance readability and correct typographical errors. Based on the foregoing, claims 1-41 remain pending in the application.

In the Office Action mailed October 4, 2004, claims 1-41 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,736,725 to Burns et al. ("Burns") in view of U.S. Patent No. 6,318,536 to Korman et al. ("Korman").

A. Response to the Section 103 Rejection of Claims 1-41

Claims 1-41 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Burns in view of Korman. To establish a *prima facie* case of obviousness, the prior art reference (or references when combined) must teach or suggest <u>all of the claimed features</u>. (MPEP § 706.02(j); emphasis added.) As set forth in detail below, the applied references of Burns and Korman cannot support a Section 103 rejection of claims 1-41 for at least the reason that these references fail to teach or suggest all the claimed features.

1. Independent Claim 1 is Directed to a Method for Verifying a Voucher or Token at a Cashier's Station that Uses a First Communication Link Coupled to a Back Room Computer and a Second Communication Link to Query a Voucher or Token Database

Independent claim 1 is directed to a method for verifying a voucher or token that includes, *inter alia*, recording a code associated with the voucher or token. The method further includes scanning the voucher or token at a cashier's station to retrieve the code, and querying a database for information associated with the code. The method also includes determining whether the voucher or token is valid using the information. Claim 1 further recites that the cashier's station uses a first communication link coupled

to a back room computer, but a second communication link is used to query the voucher or token database for information about the code.

2. <u>Burns is Directed to a Gaming Apparatus that Includes a Slot Machine Capable of Printing and Dispensing Cash Out Slips</u>

Burns is directed to a gaming apparatus that includes a slot machine having an optical paper currency reader capable of recognizing and validating paper currency and providing credit corresponding to the value of the currency. Figure 1 of Burns discloses a coinless gaming system 10 including a host central processing unit (CPU) 100 connected to a series of slot machines 200. The individual slot machines 200 include a paper currency reader 204, a bar code reader 206, and a bar code printer 208. In operation, a user inserts currency into the paper currency reader 204 or a voucher into the bar code reader 206. The currency reader 204 and/or bar code reader 206 determines the credit available to the user. When the user is done gambling at the slot machine 200, the bar code printer 208 prints a cash out slip 220 having a bar code 222. The bar code 222 represents the monetary value of the credit stored in the particular slot machine 200, along with a randomly generated number used to verify the validity of the cash out slip 220. (Burns, col. 6, Ins. 51-55.) The user can then take the cash out slip 220 and insert it into the bar code reader 206 of another slot machine 200 and continue gambling, or the user can take the cash out slip 220 to a cashier's station to receive his or her winnings. The cashier's station is connected to the CPU, which authenticates the cash out slip 220 by examining the randomly generated number on the cash out slip 220.

3. Korman is Directed to a Multi-Transaction Coin Machine

Korman is directed to a coin machine that accepts a number of coins, counts the coins, and displays the value to a user. The user is then presented with a variety of options in exchange for the value of the coins, including a variety of electronic financial transactions, paying bills, purchasing tickets, or a receipt redeemable for cash. Referring to Figure 1, Korman discloses a coin counting kiosk 10 including a coin counting module 18 and a touch screen display 76. The touch screen display 76 is the primary means of communication between the user and the kiosk 10. The kiosk 10 also includes a central computer 74 (Figure 4) that controls the operation of the kiosk 10.

Referring to Figure 5, the central computer of the kiosk 10 is networked to a remote host computer. The remote host computer in turn has two-way communication with a plurality of remote terminals (e.g., ATM/POS networks, airline reservation systems, movie ticket systems, lottery ticket systems). Korman also discloses an embodiment where the kiosk 10 is connected directly to remote terminals such that the kiosk "communicate[s] directly with third parties, and perform[s] all necessary protocol translations itself." (Korman, col. 11, lns. 11-13.)

In a typical transaction, the kiosk 10 prompts the user for information regarding the desired transaction. The kiosk 10 then transmits the user-entered information to the remote host computer, which "translate[s] these instructions to the appropriate protocol, contact[s] the third party [remote terminal], receive[s] the information, translate[s] into the new format if necessary, [and] then transmit[s] the information to the appropriate kiosk PC." (Korman, col. 11, Ins. 7-10.)

4. Burns and Korman Cannot Support a Section 103 Rejection of Claim 1 for at Least the Reason that These References Fail to Teach or Suggest a First Communication Link Between the Cashier's Station and the Back Room Computer, and a Second Communication Link for Querying a Voucher or Token Database

Independent claim 1 is directed to a method for verifying a voucher or token at a cashier's station. The cashier's station uses a first communication link coupled to a back room computer, and a second communication link to query the voucher or token database for information about the code associated with the voucher. Neither Burns nor Korman teach or suggest these features. Indeed, the Office Action correctly notes that Burns does not teach the second communication link. To cure this deficiency, however, the Office Action relies on Korman. But Korman also does not teach the second communication link. Korman, at most, teaches a communication link between the kiosk 10 and a remote host computer or terminal. Nowhere does Korman teach or suggest that this communication link queries a "voucher or token database" for information about a voucher or token code. In contrast, the communication link in Korman is expressly for transmitting user-entered information to the remote host computer and/or remote terminal. Thus, Burns and Korman, either alone or in combination, fail to teach or

suggest all of the claimed features. Accordingly, the Section 103 rejection of claim 1 should be withdrawn.

Burns and Korman cannot support a Section 103 rejection of claim 1 for the additional reason that one of skill in the art would not be motivated to combine the teachings of Burns with the teachings of Korman. The MPEP states that "[t]he mere fact that references can be combined or modified does not render the resultant combination obvious unless the <u>prior art</u> also suggest the desirability of the combination." (MPEP § 2143.01; emphasis added.) Here, the prior art does not suggest the desirability of the combination. In fact, the prior art teaches away from the combination proposed by the Office Action because Burns is specifically directed to a "<u>coinless</u>" apparatus. The purpose of Burns's invention is to overcome the shortcomings of coin-operated machines, and Burns discusses the various disadvantages associated with coin-operated machines such as Korman's device. (Burns, col. 1, Ins. 10-59.) Accordingly, a person of skill in the art would not be motivated to combine the coin-less invention of Burns with the <u>coin-counting apparatus</u> of Korman.

Furthermore, the system of Burns is "closed" to prevent fraud. More particularly, the slot machines 200 are connected only to the CPU 100 within the casino, and the CPU 100 is connected only to the cashier's station (also located within the casino). In this way, the likelihood of fraud is mitigated because it is more difficult for unauthorized users (e.g., hackers) to obtain access to the closed system. Conversely, the system of Korman requires that the kiosk be operatively connected to a plurality of remote systems that can increase the likelihood that unauthorized users could gain access to the system. Thus, one skilled in the art would not be motivated to combine the open system of Korman with the closed system of Burns for this additional reason. Accordingly, for at least these reasons, the Section 103 rejection of claim 1 should be withdrawn.

Claims 2-4 and 7-12 depend from base claim 1. Accordingly, Burns and Korman cannot support a Section 103 rejection of claims 2-4 and 7-12 for at least the reason that these references cannot support a Section 103 rejection of base claim 1, and for

the additional features of these dependent claims. Therefore, the Section 103 rejection of dependent claims 2-4 and 7-12 should be withdrawn.

Independent claim 5 includes several features generally similar to claim 1. Furthermore, claim 5 recites that "the querying step includes querying a kiosk which includes at least a portion of the voucher or token database." Burns and Korman fail to teach or suggest that "at least a portion of the voucher or token database" is part of the kiosk. Accordingly, the Section 103 rejection of claim 5 should be withdrawn for at least this reason.

Claim 6 depends from base claim 5. Accordingly, Burns and Korman cannot support a Section 103 rejection of claim 6 for at least the reason that these references cannot support a Section 103 rejection of base claim 5, and for the additional features of this dependent claim. Therefore, the Section 103 rejection of claim 6 should be withdrawn.

Independent claims 32, 37, and 38 are directed to methods for verifying the validity of vouchers or tokens, and include several features generally similar to claim 1. Accordingly, these claims are allowable over the applied references for at least the reasons discussed above with respect to claim 1, and for the additional features of these claims. Therefore, the Section 103 rejection of claims 32, 37, and 38 should be withdrawn.

Claims 33-36 depend from base claim 32, and claim 39 depends from base claim 38. Accordingly, Burns and Korman cannot support a Section 103 rejection of claims 33-36 and 39 for at least the reason that these references cannot support a Section 103 rejection of corresponding base claims 32 and 38, and for the additional features of these dependent claims. Therefore, the Section 103 rejection of claims 33-36 and 39 should be withdrawn

5. Independent Claim 13 is Directed to a System that Verifies a Voucher or Token and Includes, Inter Alia, a Cashier's Station that uses a First Communication Link with a Back Room Computer, and First and Second Transceivers that form a Second Communication Link Between a Voucher or Token Database and a Recognition Subsystem

Independent claim 13 is directed to a system for verifying a voucher or token. The system includes a cashier's station that uses a first communication link with a back room computer, and a voucher or token database that stores at least one of a code and a value associated with the voucher or token. The system also includes a recognition subsystem that reads the code from the voucher or token, and first and second transceivers that form a second communication link coupling the voucher or token database and the recognition subsystem together. The second communication link is different from the first communication link.

As discussed above, Burns and Korman fail to teach or suggest "a first communication link with a back room computer" and a "second communication link coupling the voucher or token database and the recognition subsystem together." Accordingly, the Section 103 rejection of claim 13 should be withdrawn for at least this reason.

Claims 14-17 and 19 depend from base claim 13. Accordingly, Burns and Korman cannot support a Section 103 rejection of claims 14-17 and 19 for at least the reason that these references cannot support a Section 103 rejection of base claim 13, and for the additional features of these dependent claims. Therefore, the Section 103 rejection of claims 14-17 and 19 should be withdrawn.

Independent claim 18 includes several features generally similar to claim 13. Furthermore, the system of claim 18 requires "a kiosk which includes a coin counting mechanism" and recites that "at least a part of the voucher or token database is located in the kiosk." Burns and Korman fail to teach or suggest that "at least a portion of the voucher or token database" is part of the kiosk. Accordingly, the Section 103 rejection of claim 18 should be withdrawn.

Attorney Docket No. 213828015US1

Independent claims 20 and 40 are directed to systems for verifying a voucher or

token that include several features generally similar to claim 13. Accordingly, claims 20

and 40 are allowable over the applied references for at least the reasons discussed

above with respect to claim 13, and for the additional features of these claims.

Therefore, the Section 103 rejection of claims 20 and 40 should be withdrawn.

Claims 21-31 and 41 depend from base claim 20. Accordingly, Burns and

Korman cannot support a Section 103 rejection of claims 21-31 and 41 for at least the

reason that these references cannot support a Section 103 rejection of base claim 20,

and for the additional features of these dependent claims. Therefore, the Section 103

rejection of claims 21-31 and 41 should be withdrawn.

Conclusion

In view of the foregoing, the pending claims comply with 35 U.S.C. § 112 and are

patentable over the applied art. The applicant respectfully requests reconsideration of

the application and a mailing of a Notice of Allowance. If the Examiner has any

questions or believes a telephone conference would expedite prosecution of this

application, the Examiner is encouraged to call the undersigned at (206) 359-3982.

Respectfully submitted,

Perkins Coie LLP

Date: February 4, 2005

Aarón J. Poledna

Registration No. 54,675

Correspondence Address:

Customer No. 25096

Perkins Coie LLP

P.O. Box 1247

Seattle, Washington 98111-1247

(206) 359-8000